

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

HENG GUO JIN,

Plaintiff,

v.

HAN SUNG SIKPOOM TRADING CORP. and
CHEL CHANG,

Defendants.

Civ No. 13-cv-6789 (CBA) (LB)

DECLARATION OF ROSHNI CHAUDHARI

ROSHNI CHAUDHARI, under penalty of perjury and pursuant to 28 U.S.C. §1746, declares as follows:

1. I am an attorney at the firm Ford & Harrison LLP, attorneys for the Defendant Han Sung Sikpoom Trading Corp. and Chel Chang (“Defendants”) in this action. I am familiar with the facts and circumstances set forth in this Declaration. I make this Declaration in support of Defendants’ Motion for Partial Summary Judgment.

2. Annexed hereto as Exhibit A is a true and correct copy of the Complaint in this action, as submitted as Exhibit A to the Deposition of Chel Chang, October 31, 2014 (“Chang Dep.”).

3. Annexed hereto as Exhibit B is a true and correct copy of Plaintiff’s Response to Interrogatories, undated, as submitted as Exhibit B to the Chang Dep.

4. Annexed hereto as Exhibit C is a true and correct copy of Plaintiff’s Responses to Disclosure Amended Interrogatories, undated, as submitted as Exhibit C to the Chang Dep.

5. Annexed hereto as Exhibit D is a true and correct copy of Plaintiff's letter, without enclosures, to this Court in response to Defendants' request for a pre-motion conference, dated December 2, 2014 and filed with this Court on the same date as document number 18 on the electronic docket.

6. Annexed hereto as Exhibit E is a true and correct copy of the transcript of the Deposition of Chel Chang, October 31, 2014.

7. Annexed hereto as Exhibit F is a true and correct copy of a portion of a customer and invoice list produced during litigation by Defendants, bearing bates number HSST2 - 00020.

Executed on February 13, 2015 in New York, New York.

A handwritten signature in black ink, appearing to read 'R. Chaudhari', is written over a horizontal line.

Roshni Chaudhari
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